

1 Eric H. Gibbs (SBN 178658)

2 ehg@classlawgroup.com

3 David Stein (SBN 257465)

4 ds@classlawgroup.com

5 **GIBBS LAW GROUP LLP**

6 505 14th Street, Suite 1110

7 Oakland, California 94612

8 Telephone: (510) 350-9700

9 Facsimile: (510) 350-9701

10 Kim D. Stephens (*pro hac vice*)

11 kstephens@tousley.com

12 Jason T. Dennett (*pro hac vice*)

13 jdennett@tousley.com

14 **TOUSLEY BRAIN STEPHENS PLLC**

15 1700 7th Avenue, Suite 2200

16 Seattle, Washington 98101

17 Telephone: (206) 682-5600

18 Facsimile: (206) 682-2992

19 *Proposed Class Counsel*

20 [Additional counsel on signature page]

21 **UNITED STATES DISTRICT COURT**
22 **CENTRAL DISTRICT OF CALIFORNIA**

23 BILLY GLENN, *et al.*,

24 Plaintiffs,

25 v.

26 HYUNDAI MOTOR AMERICA, *et*
27 *al.*,

28 Defendants.

Case No. 8:15-cv-02052-DOC-KES

**PLAINTIFFS' NOTICE OF MOTION
AND MOTION TO DIRECT NOTICE
OF PROPOSED CLASS ACTION
SETTLEMENT**

Date: February 25, 2019

Time: 8:30 a.m.

Judge: The Hon. David O. Carter

Courtroom: 9D

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on February 25, 2019, or as soon thereafter as the matter may be heard, before the Honorable David O. Carter, District Judge of the United States District Court for the Central District of California, in Courtroom 9D, Ronald Reagan Federal Building, United States Courthouse, 411 West Fourth Street, Santa Ana, California, 92701, Plaintiffs Billy Glenn, Kim Fama, Jahan Mulla, Kathy Warburton, Roxana Fitzmaurice, and Corinne Kane will, and hereby do, move for entry of an order directing notice of their proposed settlement to the proposed settlement class, approving the proposed notices and notice plan set forth in the settlement agreement pursuant to Fed. R. Civ. P. 23(e), appointing Class Counsel pursuant to Fed. R. Civ. P. 23(g), and setting a schedule for final settlement approval.

Plaintiffs' motion is based on this notice; the accompanying memorandum of points and authorities; the declaration of David Stein and all attachments thereto (including the Settlement Agreement); the declaration of Kim Stephens, and all other papers filed and proceedings had in this action.

DATED: January 30, 2019

Respectfully submitted,

GIBBS LAW GROUP LLP

By: /s/ David Stein

Eric H. Gibbs (SBN 178659)
 Steve Lopez (SBN 300540)
 505 14th Street, Suite 1110
 Oakland, California 94612
 Telephone: (510) 350-9700
 Facsimile: (510) 350-9701
 ehg@classlawgroup.com
 ds@classlawgroup.com
 sal@classlawgroup.com

1 Kim D. Stephens (*pro hac vice*)
2 Jason T. Dennett (*pro hac vice*)
3 **TOUSLEY BRAIN STEPHENS PLLC**
4 1700 Seventh Avenue, Suite 2200
5 Seattle, WA 98101
6 Telephone: (206) 682-5600
7 Facsimile: (206) 682-2992
8 kstephens@tousley.com
9 jdennett@tousley.com

Proposed Class Counsel

10 Gregory F. Coleman (*pro hac vice*)
11 Lisa A. White (*pro hac vice*)
12 Mark E. Silvey (*pro hac vice*)
13 **GREG COLEMAN LAW PC**
14 First Tennessee Plaza
15 800 S. Gay Street, Suite 1100
16 Knoxville, Tennessee 37929
17 Telephone: (865) 247-0080
18 Facsimile: (865) 533-0049
19 greg@gregcolemanlaw.com
20 lisa@gregcolemanlaw.com
21 mark@gregcolemanlaw.com

22 Shanon J. Carson (*pro hac vice*)
23 Paul C. Peel (*pro hac vice*)
24 **FARRIS BOBANGO BRANAN PLC**
25 999 S. Shady Grove Road, Suite 500
26 Memphis, Tennessee 38120
27 (901) 259-7100 Telephone
28 (901) 259-7150 Facsimile
ppeel@farris-law.com

Eric Lechtzin (SBN 248958)
BERGER & MONTAGUE, P.C.
1622 Locust Street
Philadelphia, PA 19103

215-875-3000 Telephone
215-875-4604 Facsimile
scarson@bm.net
elechtzin@bm.net

Attorneys for Plaintiffs